

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

WANDA WILLIAMS, Individually and	§	
As Conservator for John Robert	§	
Williams, Jr., Incapacitated,	§	
	§	
Plaintiff,	§	
	§	
v.	§	1:14-CV-383-HSO-JCG
	§	
MANITOWOC CRANES, LLC,	§	
	§	
Defendant.	§	

**PLAINTIFF’S MOTION IN LIMINE NUMBER 2:
EXCLUSION OF EVIDENCE OF VT HALTER’S IRRELEVANT ACTIONS**

Plaintiff Wanda Williams, individually and as conservator for John Robert Williams, Jr., incapacitated, moves the Court, in limine, to prohibit the Defendant, its attorneys and witnesses from arguing, introducing evidence, commenting, or otherwise discussing in front of the jury VT Halter Marine’s (Mr. Williams’s employer) irrelevant actions, including, but not limited to:

- (1) VT Halter’s failure to replace the load cell on the subject crane from January 2014 until two days before the tip over;
- (2) VT Halter’s past history of on-the-job accidents and safety violations;
- (3) Another crane operator, Harold “Topper” Abbott, driving his crane under the Williams crane before the tip over made the basis of this civil action;
- (4) David Smith’s failed drug test and subsequent firing, months after the subject tip over.

In support of this Motion, Plaintiff is concurrently filing a supporting memorandum brief. For the reasons stated therein, Plaintiff moves the Court to enter an order prohibiting Defendant, its attorneys and witnesses from discussing VT Halter Marine's prior irrelevant actions in the presence of the jury.

Respectfully submitted this 6th day of September 2016.

Attorneys for Plaintiffs,

/s/ Bryan E. Comer

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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of September, 2016, I filed the foregoing document with CM/ECF, which will send notice to:

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